

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Bruce Meacham

**Title:** Senior Specialist

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-1 Please identify the amount of and basis for any shared or common cost markup that BAMA believes should be included in its prices for line sharing related rate elements. Please describe how that factor was calculated and provide the underlying supporting calculations.

**REPLY:** BA-MA objects to this request on the grounds that the undefined term "markup" is vague and ambiguous. Notwithstanding this objection, BA-MA responds as follows:

The factors used to assign directly attributable and common costs for the line sharing related rate elements were taken from Attachment E of the February 14, 1997, TELRIC Compliance Filing approved by the Department. These factors are shown on Workpaper Section 4, Page 1, Lines 1 and 2 of the Line Sharing Cost Study filed May 5, 2000 in this proceeding.

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Bruce Meacham

**Title:** Senior Specialist

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-3 Please provide a complete copy of the cost study, with all associated workpapers, backup material, source or other supporting data, that BAMA intends to rely on to support any proposed non-recurring charge for the tie cables/cross-connection used to implement line sharing arrangements. To the extent that BAMA believes that its cost study inputs or assumptions are supported by factual data (*e.g.*, such as time and motion studies, invoices that identify the price that BAMA has recently paid for materials, *etc.*) please insure that a copy of that material is provided and is properly cross-referenced to the portion of the study that it supports. To the extent that BAMA's study includes spreadsheet calculations or formulas, please provide a copy of that material in both electronic and paper formats.

**REPLY:** BA-MA objects to this request on the grounds that the request is unreasonable because of the overly broad scope of the data requested and the burden of compliance. Further, BA-MA objects to this request because it seeks to have BA-MA "describe" a document or create a special study, index, a "cross-reference" chart or other materials. Such a request is unreasonable and unduly burdensome to the extent that the information is not readily available and BA-MA is, therefore, required to undertake a time-consuming work effort, which can be performed by the parties themselves based on data that has already been provided.

Notwithstanding its objection, BA-MA responds as follows:

See cost documentation contained in BA-MA's May 5, 2000, tariff filing and in Exhibits attached to the Direct Testimony of Bruce Meacham filed on June 15, 2000.

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The non-recurring cost for tie cables/cross-connections was taken from BA-MA's February 9, 2000, Nonrecurring Cost Compliance Filing in the Consolidated Arbitrations proceeding. This cost covers the work performed by Central Office Frame Technicians to complete 2-wire copper cross-connections between any two points on or about the Frame and/or Office Equipment. The work activities and time required for the work do not differ between different 2-wire services. The source of this cost is Attachment A, Workpaper I, Line 12F of BA-MA's Non-recurring Cost Study identified above.

The same underlying cost principles and supporting data requirements apply to all other UNE non-recurring service order and provisioning costs that support line sharing arrangements.

**REPLY: RL/CVD 1-3** Due to the voluminous nature of the Non-recurring Cost Compliance Study, the Company will provide a copy to the Department. A copy will be made available for inspection by other parties at the Company's offices at 125 High Street, Boston, Massachusetts, at a mutually agreeable time.

(cont'd)

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**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-4 Is it technically infeasible to provide a line sharing arrangement that includes a splitter mounted directly on BAMA's main distribution frame? If BAMA contends that it is technically infeasible to provide a line sharing arrangement that includes a splitter mounted directly on its main distribution frame, please provide a complete copy of all material that BAMA intends to rely on as the factual basis for that contention.

**REPLY:** There is no NEBS-compliant frame mounted splitter which would make such a line sharing configuration technically feasible. However, even if such equipment existed, not every central office has frame space available to mount such splitters. In our effort to standardize installations, and as such minimize costs, the options selected for splitters were limited to locations where sufficient space existed to accommodate both the splitter shelves and any test heads necessary to provision and maintain service. The same arrangement had to be accommodated in every office and for that reason the frame mounted splitter blocks were ruled out as an option.

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**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Bruce Meacham

**Title:** Senior Specialist

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-5 Please provide BAMA's best available estimate of appropriate TELRIC study labor rate for the BAMA employee who would install splitter cards in a central office. Please show specifically how the labor rate was developed and identify each loading or other adder that is included in addition to the direct employee wage rate. Please also identify any order in which the methodology BAMA reflects in its response was authorized.

**REPLY:** The directly assigned labor rate for a Central Office Equipment Installation technician, \$48.25, is provided for under Job Function Code 43XXa in Attachment A, Workpaper X, Page 16 of BA-MA's February 9, 2000, Nonrecurring Cost Compliance Filing, referred to in BA-MA's Reply to RL/CVD 1-3. This rate would be applied in the development of nonrecurring costs for activities associated with the ordering and provisioning of wholesale services. BA-MA does not rely on specific labor rates such as this for the development of recurring costs. Rather, recurring costs recover investment-related expense, such as the cost of installing splitter cards, by using EF&I (Engineered, Furnished & Installed) Factors as provided in Attachment E of the February 14, 1997 TELRIC Compliance Filing.

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**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Bruce Meacham

**Title:** Senior Specialist

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-6 Please provide BAMA's best available estimate of appropriate TELRIC study labor rate for the BAMA employee who would place jumpers in a central office. Please show specifically how the labor rate was developed and identify each loading or other adder that is included in addition to the direct employee wage rate. Please also identify any order in which the methodology BAMA reflects in its response was authorized.

**REPLY:** The directly assigned labor rate for a Central Office Maintenance technician, \$43.51, is provided for under Job Function Code 43XXb in Attachment A, Workpaper X, Page 15 of BA-MA's February 9, 2000, Nonrecurring Cost Compliance Filing, referred to in BA-MA's Reply to RL/CVD 1-3.

Please see BA-MA's Reply to RL/CVD 1-5.

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Bruce Meacham

**Title:** Senior Specialist

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-8 Please provide BAMA's best available estimate of appropriate TELRIC study labor rate for the BAMA employee who would install equipment racks or frames in a central office. Please show specifically how the labor rate was developed and identify each loading or other adder that is included in addition to the direct employee wage rate. Please also identify any order in which the methodology BAMA reflects in its response was authorized.

**REPLY:** The directly assigned labor rate for a Central Office Equipment Installation technician, \$48.25, is provided for under Job Function Code 43XXa in Attachment A, Workpaper X, Page 16 of BA-MA's February 9, 2000, Nonrecurring Cost Compliance Filing, referred to in BA-MA's Reply to RL/CVD 1-3.

Please see BA-MA's Reply to RL/CVD 1-5.

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**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**  
**COMMONWEALTH OF MASSACHUSETTS**  
**D.T.E. 98-57 Phase III**

**Respondent:** Bruce Meacham

**Title:** Senior Specialist

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-9 Please provide BAMA's best available estimate of appropriate TELRIC study labor rate for the BAMA employee who would repair or maintain splitter equipment in a central office. Please show specifically how the labor rate was developed and identify each loading or other adder that is included in addition to the direct employee wage rate. Please also identify any order in which the methodology BAMA reflects in its response was authorized.

**REPLY:** The directly assigned labor rate for a Central Office Maintenance technician, \$43.51, is provided for under Job Function Code 43XXb in Attachment A, Workpaper X, Page 15 of BA-MA's February 9, 2000, Nonrecurring Cost Compliance Filing, referred to in BA-MA's Reply to RL/CVD 1-3.



Please see BA-MA's Reply to RL/CVD 1-5.

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**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Bruce Meacham

**Title:** Senior Specialist

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-10 Does the cost support developed for BAMA's existing ADSL retail tariff include Residential Service Contribution Rate Element?

**REPLY:** BA-MA objects to this request on the grounds that the request seeks information that is not relevant to BA-MA's xDSL or line sharing unbundled network element tariff offering. Notwithstanding this objection, BA-MA responds as follows:

The Infospeed retail tariff filed with the FCC did not include an explicit Residential Contribution Rate Element.

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**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Bruce Meacham

**Title:** Senior Specialist

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-13 Does BAMA intend to impose any non-recurring charge for placing jumpers to implement any line sharing arrangement? If so, please describe the number of jumper placements that would be required in each line sharing arrangement that BAMA intends to provide.

**REPLY:** BA-MA intends to apply two non-recurring charges for the placement of central office jumpers. One charge is intended to recover the costs

of connecting the end-user cable and pair to the Main Distribution Frame termination where the splitter resides. The second charge is intended to recover the costs of connecting the splitter to the office equipment.

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**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Bruce Meacham

**Title:** Senior Specialist

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-14 If BAMA intends to rely on any existing study of the non-recurring

cost for the jumper placement used to implement any line sharing arrangement, please provide any analysis that BAMA has done to establish that the existing study assumptions apply to BAMA's proposed line sharing arrangements(s).

**REPLY:**

Under either Option A (Splitter in Cage) or Option C (Splitter in BA-MA space), two cross-connections are required at the Main Distribution Frame. One cross-connection is needed to connect the end-user line to the splitter and subsequently to the CLEC DSLAM, the other connects BA-MA's switch to the splitter. The cost for placing a jumper in conjunction with a line sharing arrangement is the same as the cost to place a jumper when provisioning a 2-wire analog loop. In both instances, the same work steps, level of complexity and duration are encountered.

The cost analysis of the jumper connection is included in the Nonrecurring Cost study discussed in BA-MA's Reply to RL/CVD 1-3 as part of the CO Frame work-group functions. The activities, times, occurrences and labor rates within the CO Frame work group comprise the analysis of the cost of jumper connections.

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**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Bruce Meacham

**Title:** Senior Specialist

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-15 Please provide a complete copy of the cost study, with all associated workpapers, backup material, source or other supporting data, that BAMA intends to rely on to support any proposed non-recurring charge for the jumper placement used to implement line sharing arrangements. To the extent that BAMA believes that its cost study inputs or assumptions are supported by factual data (e.g., such as time and motion studies, invoices that identify the price that BAMA has recently paid for materials, etc.) please insure that a copy of that material is provided and is properly cross- referenced to the portion of the study that it supports. To the extent that BAMA's study includes spreadsheet calculations or formulas, please provide a copy of that material in both electronic and paper formats.

**REPLY:** Please see BA-MA's Objection and Reply to RL/CVD 1-3.

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Bruce Meacham

**Title:** Senior Specialist

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-16 Does BAMA intend to impose any non-recurring charge for removing jumpers to implement any line sharing arrangement? If so, please describe the number of jumper removals that would be required in each line sharing arrangement that BAMA intends to provide.

**REPLY:** BA-MA does not intend to impose any non-recurring charge for removing jumpers (cross-connects) to implement any line sharing arrangement. The cost of removing the existing cross-connect between the horizontal side of the Main Distribution Frame and the office equipment has already been recovered through the non-recurring charges to the end-user customer at the time voice grade service was established.

Consistent with the Department's Order in the Consolidated Arbitrations – Phase 4, disconnects will be recovered through the wholesale non-recurring connect charge. Two disconnects will be required – one to disconnect the end-user cable and pair from the Main Distribution Frame, and one to disconnect the splitter from the office equipment.

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**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Bruce Meacham

**Title:** Senior Specialist

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-17 IF BAMA intends to rely on any existing study of the non-recurring cost for the jumper removal used to implement any line sharing arrangement, please provide any analysis that BAMA has done to establish that the existing study assumptions apply to BAMA's proposed line sharing arrangements(s).

**REPLY:** Please see BA-MA's Reply to RL/CVD 1-16.

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**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Bruce Meacham

**Title:** Senior Specialist

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-18 Please provide a complete copy of the cost study, with all associated workpapers, backup material, source or other supporting data, that BAMA intends to rely on to support any proposed non-recurring charge for the jumper removal used to implement line sharing arrangements. To the extent that BAMA believes that its cost study inputs or assumptions are supported by factual data (*e.g.*, such as time and motion studies, invoices that identify the price that BAMA has recently paid for materials, etc.) please insure that a copy of that material is provided and is properly cross-referenced to the portion of the study that it supports. To the extent that BAMA's study includes spreadsheet calculations or formulas, please provide a copy of that material in both electronic and paper formats.

**REPLY:** Please see BA-MA's Objection and Reply to RL/CVD 1-3.



**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Bruce Meacham

**Title:** Senior Specialist

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-19 Does BAMA intend to impose any non-recurring charge for service order processing to implement any line sharing arrangement? If so, please provide a detailed description of the assumptions incorporated into BAMA's analysis.

**REPLY:** Yes, a service order will be required to initiate the connect/disconnect provisioning process for a line sharing request. The associated costs will be charged per service order request. The service order costs for line sharing arrangements are the same as those for a 2-wire UNE loop. The service order costs are documented in BA-MA's February 9, 2000, Nonrecurring Cost Compliance Filing, referred to in BA-MA's Reply to RL/CVD 1-3.

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**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**  
**COMMONWEALTH OF MASSACHUSETTS**  
**D.T.E. 98-57 Phase III**

**Respondent:** Bruce Meacham

**Title:** Senior Specialist

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1  
**DATED:** June 5, 2000  
**ITEM:** RL/CVD 1-20 If BAMA intends to rely on any existing study of the non-recurring cost for a service order to implement any line sharing arrangement, please provide any analysis that BAMA has done to establish that the existing study assumptions apply to BAMA's proposed line sharing arrangement(s).  
**REPLY:** Please see BA-MA's Objection and Reply to RL/CVD 1-3.

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**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Bruce Meacham

**Title:** Senior Specialist

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-21 Please provide a complete copy of the cost study, with all associated workpapers, backup material, source or other supporting data, that BAMA intends to rely on to support any proposed non-recurring charge for service order used to implement line sharing arrangements. To the extent that BAMA believes that its cost study inputs or assumptions are supported by factual data (e.g., such as time and motion studies, invoices that identify the price that BAMA has recently paid for materials, etc.) please insure that a copy of that material is provided and is properly cross-referenced to the portion of the study that it supports. To the extent that BAMA's study includes spreadsheet calculations or formulas, please provide a copy of that material in both electronic and paper formats.

**REPLY:** Please see BA-MA's Objection and Reply to RL/CVD 1-3.

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**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-25 Please provide a complete copy of any existing correspondence

between one or more of BAMA, its parent, Bell Atlantic, or any affiliate and vendors related to incremental OSS changes hat BAMA anticipates it might incur for line sharing associated with its pre-order, order and billing systems.

**REPLY:**

BA-MA objects to this request on the grounds that it is overly broad and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding.

BA-MA further objects on the grounds that the information requested is irrelevant as it relates to Bell Atlantic affiliate not regulated by the Department, and may be confidential in nature.

In addition, BA-MA objects to this request because it seeks to have BA-MA produce material provided by third-party vendors and other competitive providers, thereby seeking access to the potentially competitively sensitive business information of such vendors or competitors which is not appropriate without their consent.

BA-MA also objects to this request on the grounds that the phrase "anticipates it might occur" is vague, ambiguous, speculative and not a relevant standard for cost recovery. Notwithstanding its objections, BA-MA provides the attached presentation, "Telcordia Line Sharing Solution," dated June 1, 2000.

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**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1  
**DATED:** June 5, 2000  
**ITEM:** RL/CVD 1-26 Please provide a complete copy of any existing correspondence between one or more of BAMA, its parent, Bell Atlantic, or any affiliate and its vendors related to incremental OSS changes that BAMA anticipates it might incur for line sharing associated with updating inventory and provisioning systems.  
**REPLY:** See BA-MA's Reply to RL/CVD 1-25.

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**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-27 Please provide a complete copy of any existing correspondence between one or more of BAMA, its parent, Bell Atlantic, or any affiliate and its vendors related to incremental OSS changes that BAMA anticipates it might incur for line sharing associated with testing and maintenance.

**REPLY:** See BA-MA's Reply to RL/CVD 1-25.

NET# 558

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-29 Please provide a detailed description of the most recently planned process that BAMA intends or intended to determine if specific customers/customer locations qualify for its retail ADSL service. Please provide a complete copy of whatever documentation BAMA has developed for internal use that describes the current and planned future state of that process.

**REPLY:** BA-MA objects to this request on the grounds that the request is unreasonable because of the overly broad scope of the data requested and the burden of compliance. To comply fully with this request, BA-MA would need to conduct an extensive and time-consuming search to determine whether and to what extent documents exist that are responsive to this request and then assemble that information. BA-MA further objects on the grounds that the information requested is irrelevant, as it relates to a Bell Atlantic affiliate not regulated by the Department, and may be confidential in nature. Notwithstanding its objection, BA-MA responds as follows:

The same process described below will be used by BA-MA's affiliated companies and the CLECs to determine customer qualification.

**-- Mechanized Qualification:** The affiliate or CLEC queries the Bell Atlantic mechanized loop qualification database using the working telephone number ("WTN") or the service address. This information is accessed via the WEB Graphical User Interface ("GUI") or the EDI application-to-application interfaces. This database provides

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yes/no information on loop qualification, loop length and if not qualified the reason why. If the response is positive it is noted as a qualified loop on the Local Service Request ("LSR") and the LSR is sent to Bell Atlantic. No further loop qualification is required upon receipt by Bell Atlantic. If the loop is not qualified in the Bell Atlantic database the affiliate or CLEC may want more information to



determine their course of action. At this point BA retail has not sought any further information and has not been using the additional processes available to the CLECs.

However, the same services offered to the CLECs are available to the separate affiliate. Their usage of the other processes in the future will depend on their business plans.

**REPLY:** RL/CVD 1-29  
(cont'd)

-- **Manual Qualification:** LSRs received by Bell Atlantic without a qualification notation are qualified manually. A Bell Atlantic engineer using the WTN executes a Mechanized Loop Test ("MLT"). The results of the test are interpreted to determine whether the loop is qualified. If the loop is qualified, the LSR is sent for processing. In some cases, if the MLT tests are not conclusive, engineering will use plats or database information to determine the total length including bridged tap. The response will include information on presence of load coils, Digital Loop Carrier ("DLC"), Digital Single Subscriber Carrier ("DSSC's") and interferers. If no qualified facility is available, BA will notify the affiliate or CLEC that facilities are unavailable and the order will be cancelled.

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-- **Engineering Query:** The affiliate or CLEC may submit an Engineering Query ("EQ"). The results of an EQ provides the physical loop length; the number and location of load coils; the length and location of bridged taps; the gauge of the wire, the gauge changes; and information on the presence of digital loop carrier.

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**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-31 Please identify each activity that BAMA's believes it must perform to "qualify" an unbundled loop for DSL service that BAMA believes a competitive carrier could not perform on its own behalf if it had access to the same loop plant records that BAMA utilizes. Please explain BAMA's basis for believing that a competitive carrier could not perform each step so identified on its own behalf.

**REPLY:** BA-MA does not take the position that there is any activity associated with loop qualification that a CLEC with trained and experienced personnel could not perform on its own behalf if it had access to the same records, databases and test systems. It has to be clearly understood, however, that the process of qualifying a loop is not simply a quick look-up in a single record source. It can involve the use of multiple layers of paper records as well as potentially accessing multiple electronic data bases (including MLT access since this is the first step performed in the qualification process) in order to qualify a loop. In addition, it should be noted that information on the records can be considered customer private and any one CLEC should not have access to information pertinent to other parties' (CLECs or BA's) customers or to government secure facilities.

Paper records are also continually updated due to daily network activities. These changes must be incorporated into existing paper records and databases.

NET# 562

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-34 Please provide a complete copy of the engineering methods and procedures that BAMA would rely on to engineer and install new outside plant loop facilities.

**REPLY:** BA-MA specifically objects to this request on the grounds that the request is overly broad and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding.

NET# 565

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-59 If BAMA, Bell Atlantic or any affiliate has obtained quotations from its vendors relative to prices for upgrading its existing DLC systems to support DSL services, please provide a complete copy of those quotations and of any related description of the upgrade process and capacity. Please provide any related contracts between any of BAMA, Bell Atlantic or any affiliate and vendors, including all discount provisions.

**REPLY:** BA-MA objects to this request on the grounds that the request seeks to have BA-MA produce material provided by third-party vendors and other competitive providers, thereby seeking access to the potentially competitively sensitive business information of such vendors or competitors which is not appropriate for disclosure without their consent. Notwithstanding this objection, BA-MA responds as follows:

BA-MA has not obtained quotations from vendors for upgrading its existing DLC base to support DSL services.

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-74 Please state whether Bell Atlantic employees have conducted or currently conduct testing on loops at the MDF for any services. If the answer is yes, please state what kinds of services Bell Atlantic's employees tested or test at the MDF.

**REPLY:** BA-MA objects to this request on the grounds that it is overly broad and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding. Notwithstanding this objection, BA-MA responds as follows:

BA-MA employees perform testing at the MDF for any types of services that have a physical appearance on the MDF.

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-75 Please state whether Bell Atlantic has used any sort of wideband testing equipment on its loops. If the answer is yes, please list all types of such wideband testing equipment.

**REPLY:** Yes. Bell Atlantic has used Hekimian wideband testing equipment.

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-78 Please state what information derived from use of the Hekimian wideband testing equipment Bell Atlantic will provide to requesting CLECs. Please also state how Bell Atlantic will provide that information.

**REPLY:** The Hekimian wideband testing equipment provides the following information: POTS supervision CO Noise, Loop Noise, Dial Tone, Loop Wiring, ADSL Signal, and ATU-R Detection. Much of this information will be provided through a RETAS Interface. Additional functionality is being investigated.

NET# 609

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-79 Please state whether Bell Atlantic will provide requesting CLECs with electronic access to the Hekimian wideband testing equipment that Bell Atlantic plans to deploy.

**REPLY:** BA-MA is currently reviewing the feasibility of providing this access.



**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-80 Please provide Bell Atlantic's Network Planning Document (NP-DP-99-155).

**REPLY:** BA-MA objects to this request on the grounds that it is irrelevant and immaterial to this proceeding that document is outdated in that it was generated based on certain facts and assumptions that are no longer valid.

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-86 Please state whether Bell Atlantic conducts a dispatch of any kind in provisioning Infospeed DSL.

**REPLY:** BA-MA objects to this request on the grounds that it seeks information that is irrelevant, immaterial and beyond the scope of this proceeding.

BA-MA further objects on the grounds that the information requested is irrelevant as it relates to a Bell Atlantic affiliate not regulated by the Department, and may be confidential in nature. Notwithstanding its objection, BA-MA responds as follows:

Yes.

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-93 Please provide any documents that address or analyze the expected interval for collocating splitters.

**REPLY:** No such documents exist. Installation of splitters in a CLEC's collocation arrangement are considered a collocation augmentation project and as such are subject to a standard 76 business day interval.

NET# 624

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-94 Please provide any documents that address or analyze the expected interval for collocating splitters on behalf of Bell Atlantic Network Data, Inc.

**REPLY:** Please see BA-MA's Reply to RL/CVD 1-93.

The interval for collocating a splitter for BANDI will be the same as for any other CLEC.

NET# 625

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-96 Please provide any cost support that Bell Atlantic submitted to the FCC for Infospeed DSL.

**REPLY:** BA-MA objects to this request on the grounds that it is overly broad and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding.

BA-MA further objects on the grounds that the information requested is irrelevant as it relates to services provided by a Bell Atlantic affiliate not regulated by the Department, and may be confidential in nature.

NET# 627

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**  
**COMMONWEALTH OF MASSACHUSETTS**  
**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-98 Please specifically identify each cost for collocation at Bell Atlantic's remote terminals that Bell Atlantic included or believes that it should have included in its cost analysis for its retail Infospeed service.

**REPLY:** BA-MA objects to this request on the grounds that it is overly broad and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding.

BA-MA further objects on the grounds that the information requested is irrelevant as it relates to services provided by a Bell Atlantic affiliate not regulated by the Department, and may be confidential in nature.

NET# 629

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Bruce Meacham

**Title:** Senior Specialist

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-104 Please supply Bell Atlantic's best estimate of the total hours of labor required to install 24 quad splitter cards in an existing rack mounted splitter shelf. Please also supply a description of the basis for and any documentation supporting Bell Atlantic's reply.

**REPLY:** Cost studies performed for provisioning of line sharing arrangements were not developed on a work step, labor time basis and as such detail of this type is not available.

Please see BA-MA's Reply to RL/CVD 1-5.

NET# 635

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Bruce Meacham

**Title:** Senior Specialist

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-105 Please supply Bell Atlantic's best estimate of the total hours of labor required to install the type of relay rack used to hold splitter shelves. Please also supply a description of the basis for and any documentation supporting Bell Atlantic's reply.

**REPLY:** Cost studies performed for provisioning of line sharing arrangements were not developed on a work step, labor time basis and as such detail of this type is not available.

Please see BA-MA's Reply to RL/CVD 1-5.



NET# 636

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-111 Will the decision to establish a separate subsidiary to provide DSL services in any way affect BA's \$800 million commitment to Alcatel to purchase ADSL electronics for integrating Alcatel's 1000 ADSL ATM Subscriber Access Multiplexer (ASAM) TM and Litespan™ Next Generation Digital Loop Carrier (NGDLC) solutions (see Alcatel and Bell Atlantic press release of April 8, 1999, Available at [http://www.alcatel.com/press/current/1999/04\\_08.htm](http://www.alcatel.com/press/current/1999/04_08.htm))? If so, please describe specifically how that commitment would be or is affected.

**REPLY:** BA-MA objects to this request on the grounds that it is overly broad and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding.

BA-MA further objects on the grounds that the information requested is irrelevant as it relates to a Bell Atlantic affiliate not regulated by

the Department, and may be confidential in nature. Notwithstanding its objection, BA-MA responds as follows:

The commitment referred to by Covad is not a commitment to purchase any set quantity of a specific type of equipment from Alcatel. It is a market share contract (i.e., Bell Atlantic agrees to purchase at least x% of the types of equipment specified in the contract, in terms of dollar value, from Alcatel). Also, the commitment was for voice and data equipment and the \$800 million amount cited is an estimate of the value of total purchases over the five-year term of the contract. It would be premature at this point for Bell Atlantic to speculate on the impact on a contract that has just commenced.

NET# 642

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-112 Please provide a complete copy of all documentation generated by Bell Atlantic (or BA) that memorialized BA's \$800 million commitment to Alcatel to purchase ADSL electronics for integrating Alcatel's 1000 ADSL ATM Subscriber Access Multiplexer (ASAM) TM and Litespan™ Next Generation Digital Loop Carrier (NGDLC)

solutions or the terms thereof.

**REPLY:**

BA-MA objects to this request on the grounds that it is overly broad and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding.

BA-MA further objects on the grounds that the information requested is irrelevant as it relates to a Bell Atlantic affiliate not regulated by the Department, and may be confidential in nature.

NET# 643

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:**

Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:**

June 5, 2000

**ITEM:** RL/CVD 1-113

Please provide a complete copy of any network engineering documents that describe how Bell Atlantic (or BA) specifically plans integrate Alcatel's 1000 ADSL ATM Subscriber Access Multiplexer (ASAM) TM and Litespan™ Next Generation Digital Loop Carrier (NGDLC) solutions in its outside plant network.

**REPLY:**

BA-MA objects to this request on the grounds that it is overly broad and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding.

BA-MA further objects on the grounds that the information requested is irrelevant as it relates to a Bell Atlantic affiliate not regulated by the Department, and may be confidential in nature. Notwithstanding its objection, BA-MA responds as follows:

At the present time the integration of the ASAM with the NGDLC is still under investigation and trial. Since the product has not been fully tested, Bell Atlantic network engineering documents describing the process have not been developed.

NET# 644

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-114 Is the ADSL related equipment that BA has committed to purchase from Alcatel designed to support the provision of DSL-capable unbundled loops to multiple carriers? If "yes," please provide documentation supporting BA's response. If "no," please explain how Bell Atlantic intends to supply unbundled DSL-capable loops over its fiber/DLC facilities both to affiliated and unaffiliated DSL retail service providers.

**REPLY:** BA-MA objects to this request on the grounds that it is overly broad and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding.

BA-MA further objects on the grounds that the information requested is irrelevant as it relates to a Bell Atlantic affiliate not regulated by the Department, and may be confidential in nature. Notwithstanding its objection, BA-MA responds as follows:

The ability to provision DSL-capable loops to multiple carriers has not been tested and one can only rely at this point on the claims of the manufacturer. In fact, while the hardware may be capable, the OSS as they exist today may prove to be the most significant obstacle to that functionality. Any documentation relative to multi-carrier support would have to be secured from Alcatel.

NET# 645

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Amy Stern

**Title:** Director-Telecom Industry  
Services

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-115 In Pennsylvania Docket Numbers R-00994697 and R-00994697C0001 in response to Set I, Interrogatory No. 26 of Rhythms Links Inc. dated November 24, 1999, BA asserted that "... Bell Atlantic (region-wide) will deploy by the end of year 2002, approximately 9000 new optical remotes capable of delivering its retail ADSL service offering to end users." If BA anticipates that those plans would be cancelled or modified if Bell Atlantic ceases to provide retail ADSL service, please provide a detailed description of each anticipated modification.

**REPLY:** BA-MA objects to this request on the grounds that it is overly broad and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding.

BA-MA further objects on the grounds that the information requested is irrelevant as it relates to a Bell Atlantic affiliate not regulated by the Department, and may be confidential in nature. Notwithstanding its objection, BA-MA responds as follows:

At this time, Bell Atlantic does not expect that its retail ADSL service will be discontinued, and accordingly has not considered what impact, if any, such a discontinuance would have on its optical remote plans.

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Bruce Meacham

**Title:** Senior Specialist

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-117 Does Bell Atlantic anticipate that any cost of "new optical remotes capable of delivering its retail ADSL service offering to end users" will be recorded in the Bell Atlantic's books?

**REPLY:** BA-MA objects to this request on the grounds that it is overly broad and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding.

BA-MA further objects on the grounds that the information requested is irrelevant as it relates to a Bell Atlantic affiliate not regulated by the Department, and may be confidential in nature.

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 98-57 Phase III**

**Respondent:** Bruce Meacham

**Title:** Senior Specialist

**REQUEST:** Rhythms Links Inc. and Covad Communications Company, Set #1

**DATED:** June 5, 2000

**ITEM:** RL/CVD 1-118 Does Bell Atlantic anticipate that installation expense associated with any "new optical remotes capable of delivering its retail ADSL service offering to end users" will be recorded in Bell Atlantic's books?

**REPLY:** BA-MA objects to this request on the grounds that it is overly broad and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding.

BA-MA further objects on the grounds that the information requested is irrelevant as it relates to a Bell Atlantic affiliate not regulated by the Department, and may be confidential in nature.



NET#

649